

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Nathan Leftenant, Arnett Leftenant,
Jeryl Bright, Gregory Johnson, and Thomas
“Tomi” Jenkins

Plaintiffs,

v.

Lawrence (“Larry”) Blackmon,
Defendant.

No. 18-CV-01948-EJY

Lawrence (“Larry”) Blackmon,
Counterclaim Plaintiff,

v.

Nathan Leftenant, Arnett Leftenant,
Jeryl Bright, Gregory Johnson, and Thomas
“Tomi” Jenkins

Counterclaim Defendants.

STIPULATED PERMANENT INJUNCTION AS TO THOMAS JENKINS

WHEREAS, Counterclaimant Larry E. Blackmon (“Mr. Blackmon” or
“Counterclaimant”) filed trademark related counterclaims in civil action number 1:148cv-01948
in this Court against defendant, Thomas Jenkins (“Mr. Jenkins”).

WHEREAS, Mr. Blackmon is an individual residing in Henderson, Nevada.

WHEREAS, Mr. Jenkins is an individual residing in Lawrenceville, Georgia.

WHEREAS Mr. Blackmon and Mr. Jenkins have reached agreement for resolution of the
remaining pending counterclaims in this Action, the full terms and conditions of which are set
forth in the document entitled “Settlement Agreement” bearing an effective date of April 11,
2023 (the “Settlement Agreement”); and

WHEREAS the Settlement Agreement is conditioned upon entry by the Court of a stipulated permanent injunction and the continuing jurisdiction of the Court on the terms and conditions set forth herein;

THEREFOR, Mr. Blackmon and Mr. Jenkins stipulate and agree that (i) this Court has jurisdiction to enter a Stipulated Permanent Injunction on the following terms and conditions and (ii) that the Court shall have continued jurisdiction for purpose of enforcing this Permanent Injunction and the Settlement Agreement and (iii) request that the Court enter a permanent injunction on the following terms:

1. Counterclaim Defendant Thomas Jenkins, his agents, servants, employees, attorneys and all other persons who are in active concert or participation with the foregoing who receive actual notice of this Order by personal service or otherwise ARE HEREBY

PERMANENTLY RESTRAINED AND ENJOINED from:

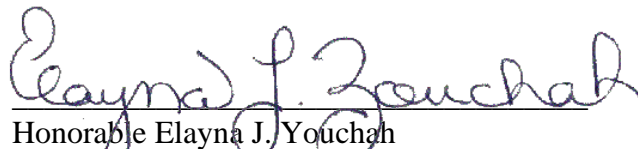
- a. infringing or commercially exploiting the term “CAMEO,” or Original CAMEO Family, except that defendant may describe himself as “formerly of CAMEO so long as the word “CAMEO” is not given more prominence than Mr. Jenkins’ name and the phrase “formerly of CAMEO” is no larger than one-half (1/2) the font size of Mr. Jenkins’ name;
- b. otherwise infringing the U.S. trademark “CAMEO” bearing Registration No. 5,171,059.
- c. Notwithstanding anything herein to the contrary, Mr. Blackmon shall not seek to prohibit Mr. Jenkins from (i) using the CAMEO trademark to indicate his former association with the CAMEO band, (ii) from stating that he appears on existing CAMEO sound recordings, or (iii) from participating

in projects including audio or video interviews, documentaries, films, tv shows or other stories about his history with CAMEO, based on a claim of infringement of the CAMEO trademark. Mr. Blackmon shall not enforce the CAMEO Trademark Rights against Mr. Jenkins for third parties that discuss or describe Mr. Jenkins' relationship to CAMEO.

2. Not later than fifteen (15) days prior to any event, including but not limited to musical performances, appearances and interviews, involving Mr. Jenkins and in which Mr. Jenkins' prior affiliation with CAMEO will be discussed, publicized, or promoted (hereinafter a "covered event"), Mr. Jenkins shall provide a copy of this Stipulated Permanent Injunction to all booking agents, promoters, producers and venues with whom Mr. Jenkins has a contractual relationship.

3. The Clerk is directed to enter this Stipulated Permanent Injunction forthwith as a Final Judgment.

IT IS SO ORDERED this 11th day of April, 2023, ~~2019~~.


Honorable Elayna J. Youchah
United States Magistrate Judge

APPROVED AND AGREED TO BY:

s/Frederick Samuels
Frederick N. Samuels (*pro hac vice*)
Cahn & Samuels, LLP
1100 17th St., NW Suite 401
Washington, D.C. 20036

s/Lita Rosario-Richardson
Lita Rosario-Richardson
SHULMAN ROGERS
12505 Park Potomac Avenue
Potomac, Maryland 20854

202 331-8777

frederick.samuels@cahnsamuels.com

William Devine, II, Esq.
Nevada Bar No. 10874
5940 S. Rainbow Blvd.
Las Vegas, Nevada 89118
702 515-1500
702 970-7175

Attorneys for Counterclaimant

301231-0931

lrosario-richardson@shulmanrogers.com

Alda Anderson
State Bar No. 8746
700 South Fourth Street
Las Vegas, Nevada 89101
702 386-6000

Attorneys for Counterclaim Defendant